

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

DONNELL RUSSELL,

Defendant.

No. 20-cr-538 (PGG)

**DEFENDANT RUSSELL'S NOTICE OF MOTION *IN LIMINE* TO  
PRECLUDE ADMISSION OR USE OF 2018 ALLEGATION (MIL NO. 3)**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, defendant Donnell Russell, pursuant to Rules 801, 404, and 609 of the Federal Rules of Evidence, will move the Court, before the Honorable Paul G. Gardephe at the United States Courthouse, 500 Pearl Street, Courtroom 705, New York, New York 10007, for an Order precluding admission or use of a 2018 allegation against Mr. Russell.

Dated: June 27, 2022

/s/ Michael G. Freedman  
THE FREEDMAN FIRM PC  
800 Wilshire Blvd., Suite 1050  
Los Angeles, CA 90017  
Telephone: (213) 816-1700  
Facsimile: (213) 816-1706  
E-Mail: [michael@thefreedmanfirm.com](mailto:michael@thefreedmanfirm.com)

Attorney for Defendant Donnell Russell

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2022, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Michael G. Freedman  
Michael G. Freedman